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6 ***UNITED STATES DISTRICT COURT***  
***DISTRICT OF NEVADA***

7 **-oOo-**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 JIANGUO HAN, and  
BING HAN,

12 Defendants.

**2:15-cr-069-JCM-NJK**

MOTION TO CONTINUE  
EVIDENTIARY HEARING ON  
DEFENDANT'S MOTION TO  
SUPPRESS

13 The United States of America, by and through DANIEL G. BOGDEN, United States  
14 Attorney, and Amber M. Craig, Assistant United States Attorney, respectfully moves this Court to  
15 continue the evidentiary hearing on Defendant's Motion to Suppress, currently scheduled for  
16 October 29, 2015, at 9:30 a.m., until after January 4, 2016.

17 This stipulation is entered into for the following reasons:

- 18 1. The Government's primary witness, Las Vegas Metropolitan Police Department  
19 Detective TJ Bachman, is on Family Medical Leave until January 4, 2016.
- 20 2. The Defendants are out of custody.
- 21 3. For the reasons stated above, the ends of justice would best be served by a continuance of  
22 the response deadline and detention hearing.
- 23 4. Additionally, denial of this request for continuance could result in a miscarriage of  
24 justice.



**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JIANGUO HAN, and  
BING HAN,

Defendants.

**2:15-cr-069-JCM-NJK**

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW, AND ORDER**

**FINDINGS OF FACT**

Based upon the Government's unopposed motion, and good cause appearing therefore, the Court finds that:

1. The Government's primary witness, Las Vegas Metropolitan Police Department Detective TJ Bachman, is on Family Medical Leave until January 4, 2016..
2. For the reasons stated above, the ends of justice would best be served by a continuance of the response deadline and the detention hearing.
3. Additionally, denial of this request for continuance could result in a miscarriage of justice.
4. The additional time requested is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(3)(A) and (h)(7)(A), considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and (h)(7)(B)(iv).

**CONCLUSIONS OF LAW**

The ends of justice served by granting said continuance outweigh the best interest of the public and the Defendant in a speedy trial, since the failure to grant said continuance would be likely

1 to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity  
2 within which to be able to effectively and thoroughly prepare for trial, taking into account the  
3 exercise of due diligence.

4 The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United  
5 States Code, Sections 3161(h)(1)(A), (h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv).

6 **ORDER**

7 IT IS THEREFORE ORDERED that the evidentiary hearing, currently scheduled for  
8 October 26, 2015, at 9:30 a.m., be vacated and continued to the 7th day of January,  
9 2016, at the hour of 9:30 a.m., in Courtroom 3D.

10 DATED this 28th day of October, 2015.

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13 HONORABLE NANCY J. KOPPE  
14 UNITED STATES MAGISTRATE JUDGE  
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